

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

April 7, 2021

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)
Under Seal -- Subject to FBI Protective Order

Dear Judge Netburn:

On behalf of plaintiffs with claims against Al Rajhi Bank (ARB), we write to respectfully request a one week extension of the deadline for submitting a proposal for jurisdictional discovery as to ARB. ARB does not oppose this request.

The Court's order directing the parties to submit a discovery proposal, ECF No. 6681, issued on Friday, March 26, 2021. Throughout the week following issuance of that order, undersigned counsel was away and generally unavailable to confer with other plaintiffs' counsel and counsel for ARB. In addition, other plaintiffs' counsel were significantly occupied during four days of that week with depositions in the MDL, and depositions are scheduled for four days of this week as well, including multiple depositions occurring today.

Honorable Sarah Netburn

April 7, 2021

Page 2

Given these circumstances, plaintiffs respectfully request a one week extension of the deadline for submitting the parties' proposal(s) for jurisdictional discovery as to ARB, from April 9, 20121 to April 16, 2021, to allow adequate time for the parties to confer.

Respectfully submitted,

COZEN O'CONNOR

By: /s/ Sean P. Carter

Sean P. Carter

Cozen O'Connor

One Liberty Place

1650 Market Street, Suite 2800

Philadelphia, PA 19103

Tel: (215) 665-2105

E-mail: scarter1@cozen.com

*On behalf of the MDL 1570 Plaintiffs' Exec.
Committees*

cc: The Honorable George B. Daniels (via ECF)
All MDL Counsel of Record (via ECF)

LEGAL\51566120\3